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15  
16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **OAKLAND DIVISION**  
19

20 TIFFANY RUFFA, KATHRYN CANFIELD,  
21 and ISIDORE NIYONGABO, on behalf of  
themselves and all others similarly situated,

22 Plaintiffs,

23 v.

24 SOCIETY FOR HUMAN RESOURCE  
25 MANAGEMENT,

26 Defendant.

**Case No. 4:21-cv-05549-DMR**

**STIPULATION TO EXTEND TIME TO  
RESPOND TO INITIAL COMPLAINT  
AND COMPLETE MEDIATION  
PROCESS PURSUANT TO GENERAL  
ORDER 56**

Complaint Filed: July 20, 2021

Current Response Date: March 15, 2022

New Response Date: May 5, 2022

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1 Plaintiffs Tiffany Ruffa, Kathryn Canfield, and Isidore Niyongabo (“Plaintiffs”) and  
 2 Defendant Society for Human Resource Management (“Defendant”), by and through their  
 3 respective counsel, jointly stipulate to extend the time for (1) the completion of the mediation  
 4 process pursuant to General Order 56 until April 29, 2022 and (2) Defendant to respond to the  
 5 Complaint from March 15, 2022 to May 6, 2022.

6 This stipulation is made in good faith and not for the purpose of causing unwarranted  
 7 delay. Good cause supports the extension because (i) only three prior extensions have been  
 8 obtained, pursuant to ongoing settlement discussions, (ii) the Parties engaged in a Settlement  
 9 Conference on March 1, 2022, by the court’s deadline, with court-assigned mediator Jamie L.  
 10 Dupree, and the parties are continuing to engage in good faith settlement negotiations, and are in  
 11 the process of scheduling a second mediation with Ms. Dupree, and (iii) the Parties are  
 12 complying with this Court’s General Order 56 and the Court’s scheduling order in this case (Dkt.  
 13 No. 5). Further, pursuant to Local Rule 6-1(a), this extension will not alter the date of any event  
 14 or any deadline already fixed by Court order.

15 IT IS SO STIPULATED.

16 DATED: March 1, 2022

HOLLAND AND KNIGHT LLP

17 By: /s/ John H. Haney

18 Thomas E. Hill  
 19 Kristina S. Azlin  
 20 John H. Haney

*Attorneys for Defendant*

21 DATED: March 1, 2022

**DISABILITY RIGHTS ADVOCATES**

22 By: /s/ Emily Seelenfreund

23 Emily Seelenfreund  
 24 Meredith J. Weaver  
 25 Rebecca Williford

*Attorneys for Plaintiffs*

**ATTESTATION OF CONSENT**

I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the electronic filing of this document with their signature.

DATED: March 1, 2022

By: /s/ John H. Haney